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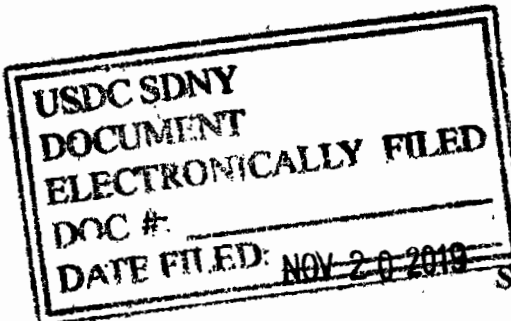
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November 18, 2019



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By ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St., Courtroom 11A
New York, NY 10007-1312

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: NOV 20 2019

Re: *Parker v. United Industries Corporation*, No. 17-cv-05353 (S.D.N.Y.)

Dear Judge Daniels:

We represent Defendant United Industries Corporation ("UIC") in the above-captioned action. Pursuant to Rule I.D. of Your Honor's Individual Practices, we respectfully request leave to file under seal the following documents being submitted to the Court today as part of UIC's Opposition to Plaintiff's Motion for Summary Judgment, Opposition to Exclude the Reports and Testimony of Dr. Denise Martin, Motion to Exclude the Reports and Testimony of Dr. William A. Donahue, Jr., and UIC's Opposition to Plaintiff's Motion for Class Certification, Appointment of Class Representative, and Appointment of Class Counsel:

1. Exhibits R, S, T, and U to the Declaration of Steven T. Rappoport in Opposition to Plaintiff's Motions to Exclude Dr. William A. Donahue, Jr. and Dr. Denise N. Martin;
2. Exhibits R, S, T, U, and V to the Declaration of Jamie Levitt in Support of UIC's Response to Plaintiff's Statement of Material Facts Pursuant to Local Rule 56.1;
3. Exhibits 1, 2, and 3 to the Declaration of Jamie Levitt in Support of UIC's Memorandum of Law in Opposition to Plaintiff's Motion for Class Certification, Appointment of Class Representative, and Appointment of Class Counsel;
4. Portions of the Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment on His Claims for Violation of N.Y. GBL §§ 349 and 350;
5. Portions of the Memorandum of Law in Opposition to Plaintiff's Motion for Class Certification, Appointment of Class Representative, and Appointment of Class Counsel;

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6. Portions of the Memorandum of Law in Opposition to Plaintiff's Motion to Exclude the Report and Testimony of Dr. William A. Donahue; and
7. Portions of Defendant's Response to Plaintiff's Statement of Material Facts Pursuant to Local Rule 56.1 in Support of his Motion for Summary Judgment on his Claims for Violation of N.Y. GBL §§ 349 and 350.

These documents and deposition transcripts contain proprietary business information that UIC has designated as "Confidential" or "Highly Confidential" under the Stipulated Protective Order entered in this action (ECF No. 15). UIC therefore requests to file the above documents under seal to avoid public disclosure of sensitive information. UIC will promptly provide Your Honor with unredacted versions of these documents.

Respectfully submitted,

/s/ Jamie A. Levitt
Jamie A. Levitt

CC: All counsel of record (via ECF)